

## **REMARKS**

### **Introduction**

By this amendment claims 1-19 are cancelled and claims 20-35 are pending. The Office Action of October 6, 2005 rejected previously pending claims 2, 4-7, 10-13 and 15-18 over the art of record. Applicants respectfully traverse the rejections.

Applicants' previously pending claims 2, 4-7, 10-13 and 15-18 have been cancelled and rewritten as new claims 20-35. Accordingly, Applicants will address the substance of the Examiner's rejections with respect to pending new claims 20-35.

### **Interview Summary**

On January 12, 2006, the Examiner requested a telephonic interview to discuss reasons for rejecting claims 4, 10, and 16 that were previously indicated as allowable in the Office Actions of March 24, 2004 and May 4, 2005. Interviews scheduled for January 17, January 19, and January 24 were postponed by the Examiner until a telephonic interview was conducted on January 31, 2006. The Examiner stated that upon further review of the references, she believed that the limitations of claims 4, 10, and 16 were disclosed.

### **Rejection under 35 U.S.C. § 103: Benson (EP 0936530) in view of Gabrielle**

The Office Action concluded that previously pending claims 2, 4-7, 10-13 and 15-18 were rendered obvious by the combination of European Patent Application No. 0936530 ("Benson") in view of the Gabrielle C. Mitchell article "USB forum produces logo, awareness initiatives" ("Gabrielle"). As argued in the Responses of January 6 and May 24, 2004, neither Benson nor Gabrielle disclose "a translation module for interpreting USB-compliant messages

into smartcard processor-compliant messages and for interpreting smartcard processor-compliant messages into USB-compliant messages" as required by present claim 20. The Office Action of March 24, 2004, paragraph 17 took to the position that because Benson states that its Virtual Smart Card Reader passes information to and from a Virtual Smart Card, Benson is capable of packaging and translating smartcard commands. Applicants respectfully submit that Benson's disclosure of passing information to and from a Virtual Smart Card does not teach or suggest the translation module of Applicants' claim 20. Accordingly claim 20 and dependent claims 21-26 are deemed allowable.

Additionally, claim 31 requires the step of "translating the smartcard reader command into a smartcard command within the personal key". Again, the disclosure of Benson directed to "passing information" does not teach or suggest the presently claimed step of translating the smartcard reader command into a smartcard command. Accordingly, claim 31 and dependent claims 32-35 are deemed allowable over the references of record. Withdrawal of the rejection is respectfully requested.

Independent claim 27 requires that Applicants' virtual smartcard reader "comprises a bootup module for responding to an operating system bootup procedure with an indication that a smartcard reader is communicatively coupled to the host processor". The Office Action of October 6, 2005 asserted that Benson discloses this limitation, citing portions of Benson that discuss the use of a dongle. Applicants respectfully submit that the dongle of Benson is not the same as the boot-up module of the present claims. Benson's dongle is a duplication-protected physical media that merely enables operation of a Virtual Smart Card program when the dongle is attached. (See Benson, col. 23, lines 35-37.) In contrast, Applicants' bootup module is able to answer the bootup query and "respond to messages from the operating system in the same way a

smartcard reader would . . ." (See Application Specification, page 11, lines 23-25.)

Therefore, it is respectfully submitted that claim 27, and its dependent claims 28-30, are allowable over the art of record. Withdrawal of the rejection is requested.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. Accordingly, Applicants request that the Examiner issue a Notice of Allowance indicating the allowability of claims 20-35 and that the application be passed to issue. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Respectfully submitted,

Dated: February 3, 2006

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